

REMARKS

The Office Action of March 9, 2004 has been reviewed and the comments therein were carefully considered. Claims 1-32 are currently pending, and claims 1-32 stand rejected. No new matter has been introduced into the application. Applicants respectfully request reconsideration of the application and allowance in view of the following arguments.

Rejections under 35 U.S.C. § 102

Claims 1-9, 11-20, 22-29, and 31-32 stand rejected under 35 U.S.C. 102(e) as being anticipated by *Stoub*, U.S. Pat. No 6,389,437 B2 filed on 01/1998 (hereinafter "*Stoub*"). Applicants respectfully traverse.

With respect to claims 1 and 12, the office action alleges that *Stoub* discloses each feature of the claimed invention. Claim 1 recites:

In a computer-based device, a method for formatting a document for presentation on a display of the computer-based device, wherein format of the document is controlled by a plurality of formatting variables, the method comprising steps of:

- a) receiving user data specifying a value for at least one user-modifiable formatting variable of the plurality of formatting variables; and
- b) in response to step a) modifying at least a portion of the plurality of formatting variables, other than the variable specified in a), such that the modified variables are optimized for readability.

Claim 12 recites:

An apparatus comprising:

- a processor;
- a display coupled to the processor;
- a user interface selection device coupled to the processor; and
- a storage device, coupled to the processor, comprising instructions, executable by the processor, for performing steps of:

a) receiving user data, via the user interface selection device, specifying a value for at least one user-modifiable formatting variable of a plurality of formatting variables used to control format of a document for display; and

b) in response to step a) modifying at least a portion of the plurality of formatting variables, other than the variable specified in a), such that the modified variables are optimized for readability.

Applicants submit that *Stoub* fails to teach or suggest a method or apparatus wherein “the modified variables are optimized for readability” as recited in claims 1 and 12. Embodiments of this claimed feature are discussed in the specification at page 12, line 20:

FIG. 6 illustrates an example of a document 622 after modification of a user-modifiable formatting value. For example, if the document in FIG. 4 corresponds to a font reference value of “small”, the document 622 shown in FIG. 6 is the result of a user changing the font reference value to “large”. In addition to a large font size 616 and adjusted leading 618, the text in FIG. 6 is no longer justified and a serified font is used. Furthermore, the top and bottom margins 606, 608, left and right margins 610, 612 and the line length 614 have been adjusted as well. . . . In accordance with the present invention, the adjustments to these variables 606-618 are in response to the change in font reference value and are based on optimized formatting values.

and further discussed in the specification at page 8, lines 5-15:

Thus, it is possible to determine the values for the various formatting variables in response to a user selecting the “small” display mode. For example, where the display device’s resolution is 240 x 320 (typical for a handheld device), a 10-point, san serif Frutiger Linotype font is used with 120% leading. However, where the display device’s resolution is 1024 x 768 (typical for desktop computer), a 13-point, Berling font with serifs is used with 115% leading. Serifs and leading are described in further detail below with regard to FIGS. 4-7. Table 3 shows exemplary values based on the font reference variable having a value of “large” and further assuming a portrait orientation of the display device used to display the document. Although device resolution and display area are expressed in pixels in Table 2 above and Table 3 below, this is done so on devices typical today in which the range of resolutions remains fairly narrow. However, in the future, such decisions will be driven by both resolution and absolute measurements of the screen (e.g inches or millimeters).

Stoub, which is directed to converting a scrollable electronic document into a non-scrollable format,

fails to teach this step and merely shows that “any change in the size of the font may alter the maximum number of columns 37 that can be displayed in the display window 17 while retaining the desired width characteristics for the columns 37.” See *Stoub*, column 6, lines 38-41.

The Office Action indicates that the claimed element of “the modified variables are optimized for readability” may be found at col. 3, lines 39-41 of *Stoub*. The Office Action states that *Stoub* at col. 3, lines 39-41 “teaches allowing a user to modify font size to enhance readability of on-screen presentation of information.” Office Action at page 4, lines 12-13.

However, with regard to independent claims 1 and 12, *Stoub* fails to disclose, teach, or suggest that “in response to a) modifying at least a portion of the plurality of formatting variables, **other than the variable specified in a)**, such that the modified variables are optimized for readability.” (Emphasis added). The cited section in *Stoub* at most suggests that a user may supply an increased font size which itself may or may not be optimized so that the material on the screen can be easily read. *Stoub* fails to disclose, teach, or suggest “modifying at least a portion of the plurality of formatting variables, **other than the variable specified in a)**, such that the modified variables are **optimized for readability.**” (Emphasis added). Therefore, for at least this reason, Applicants respectfully submit that claims 1 and 12 are distinguishable over *Stoub*.

Moreover, independent claims 1 and 12 are distinguishable over *Stoub* for at least one additional reason. *Stoub* indicates that any changes made to the text display are not for the purpose of optimizing readability, but rather are constrained by a requirement that a desired number of characters per line be maintained:

It is also to be understood that when the font-sizing mechanism 43 is activated to alter the font size as hereinbefore described, not only does the screen page formatting mechanism 23 automatically

recalculate the physical width of the columns 37 to thereby maintain the desired number of characters per line and also automatically reformat the new number of columns 37 into screen page 27, the display page formatting mechanism 25 also automatically redetermines the specific text 59, 60, 61 of the source document 33 to be displayed in each of the columns 37 of each of the display pages 57.

Stoub at col. 7, lines 25-35. Because *Stoub* imposes limits on the modifications that can be made to the display, it cannot be considered as “modifying at least a portion of the plurality of formatting variables, other than the variable specified in a), such that the modified variables are optimized for readability” as recited in claims 1 and 12, respectively. Thus, claim 1 is allowable over *Stoub*. Claims 2-11 each depend from claim 1 and are allowable as being dependent on an allowable base claim and further in view of the additional features recited therein. Claims 13-22 each depend from claim 12 and are also allowable as being dependent on an allowable base claim.

With respect to claim 23, the office action alleges that *Stoub* teaches each feature of the claimed invention. Applicants respectfully traverse this rejection. Claim 23 recites:

An apparatus comprising:

a processor;

a display coupled to the processor; and

a storage device, coupled to the processor, comprising instructions, executable by the processor, for performing steps of:

a) receiving a value of a display form factor variable indicative of display characteristics of the display; and

b) in response to step a) modifying at least a portion of a plurality of formatting variables, other than the display form factor variable specified in a), such that the modified variables are optimized for readability.

Like claims 1 and 12, claim 23 has includes the feature of “the modified variables are optimized for readability.” As discussed in connection with claims 1 and 12, *Stoub* fails to teach or suggest at least this claimed feature. Accordingly, claim 23 is allowable over *Stoub* for substantially the same

reasons as claims 1 and 12. Claims 24-31 depend from claim 23 and are also allowable as being dependent on an allowable base claim.

With respect to claim 32, the office action alleges that *Stoub* teaches each feature of the invention recited therein. Like the previously discussed independent claims, claim 32 includes the feature wherein “the modified variables are optimized for readability.” Accordingly, Applicants submit that claim 32 is allowable for substantially the same reasons as claims 1, 12, and 23.

Rejections under 35 U.S.C. § 103

Claims 10, 21, and 30 stand rejected under 35 U.S.C. 103(a) as being patentable over *Stoub*, as applied to claims 1-9, 11-20, 22-29, and 31-32, in view of *Chang* et al. U.S. Patent No. 6,584,479.

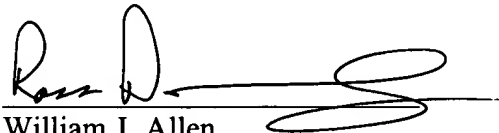
In view of the above remarks with respect to independent claims 1, 12, and 23, Applicants respectfully submit that dependent claims 10, 21, and 30 are also patentably distinct for at least the same reason as the independent claims from which they ultimately depend. Accordingly, Applicants respectfully request withdrawal of the rejection for depending claims 10, 21 and 30.

CONCLUSION

In view of the above discussion, Applicants respectfully submit that the remaining claims are in condition for allowance. Reconsideration and allowance of all remaining claims is respectfully requested. Should the Examiner believe that a conversation with the Applicant's representative would be useful in the prosecution of this case, the Examiner is invited and encouraged to call the Applicant's representative.

Respectfully submitted,

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